



HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Douglas Mickey,
President
Master Metals, Inc.
2850 W. Third Street
Cleveland, Ohio 44113

Re: RCRA §3007 and CERCLA §104(e)
Information Request
Master Metals, Inc.
OHD 097 613 871
Docket No. C86-5152A

Dear Mr. Mickey:

This is a request for information by the United States Environmental Protection Agency (U.S. EPA) pursuant to its authority under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Section 6927 and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. Law No. 99-499, 100 Stat. 1613 (1986) (SARA).

The information requested is intended to assist our investigation of the waste management activities at the Facility in order to determine compliance status with applicable hazardous waste regulations. In part, this information request concerns the generation, storage, treatment and disposal of hazardous wastes and hazardous substances at the Master Metals, Inc. Facility ("the Facility") located at 2850 W. Third Street, Cleveland, Ohio. U.S. EPA is also investigating the ability of persons connected with the Facility to fund its financial responsibility requirements of RCRA, to pay for outstanding penalties and to perform a clean-up of the Facility.

Finally, the U.S. EPA is investigating the compliance status of hazardous waste burned in Boilers and Industrial Furnaces (BIFs), as defined by 40 CFR Sections 266.100 through 266.112, at the Facility. This investigation requires inquiry into matters relating to the identification, nature, and quantity of hazardous waste that has been or may be burned at the Facility from August of 1991.

Pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, as amended, you are hereby requested to respond to the information request set forth herein.

Any request for confidentiality must be made when the information is submitted to U.S. EPA, since any information not so identified may be made available to the public without further notice to you.

The information requested herein must be provided to this office within 10 days of receipt of this letter. The information is required to be submitted notwithstanding its possible characterization as confidential. In that regard you may, under 40 CFR §2.203(a), assert a business confidentiality claim covering all or part of the information provided in the manner described in 40 CFR §2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent and by means of the procedures set forth in 40 CFR

Part 2, Subpart B. Any request for confidentiality must be made when the information is submitted, since any information not so identified may be made available to the public without further notice.

The written statements provided pursuant to this Information Request must be notarized and submitted under an authorized signature certifying that all matters contained therein are true and accurate pursuant to 40 CFR §270.11 to the best of the signatory's knowledge and belief. Any documents submitted to U.S. EPA pursuant to this information request should be certified as true and authentic to the best of the signatory's knowledge or belief.

Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, the signatory will notify U.S. EPA, Region 5, promptly. If any answer certified as true should be found to be untrue or misleading, the signatory can and may be prosecuted pursuant to 18 U.S.C. Section 1001 or §3008(d) of RCRA. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Compliance with this Information Request set forth herein is mandatory. Failure to respond fully and truthfully to the Information Request or adequately justify such failure to respond can result in enforcement action by U.S. EPA pursuant to Section 3008 of RCRA. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Act of 1980, 44 U.S.C. Section 3501, et seq.

Please direct any questions regarding this Information Request to Sheri L. Bianchin, RCRA Enforcement Branch, (312) 886-4446. If you have legal questions please contact Stuart Herish, Esq., Office of Regional Counsel (312) 886-7951.

Your response should be sent to the United States Environmental Protection Agency, 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Sheri L. Bianchin, HRE-8J.

Sincerely yours,

Joseph M. Boyle, Chief
RCRA Enforcement Branch
U.S. Environmental Protection Agency

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)	
)	
MASTER METALS, INC.)	INFORMATION REQUEST
CLEVELAND, OHIO)	PURSUANT TO SECTION
)	3007 OF RCRA, AS
)	AMENDED, 42 U.S.C. §6927(a), AND
)	SECTION 104(e) of CERCLA,
)	42 U.S.C. Section 9604(e)
EPA I.D. NO.: OHD 097 613 871)	
DOCKET NO.: C86-5152A)	
)	

This formal request by the United States Environmental Protection Agency (U.S. EPA) is issued pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927(a), as amended. This request requires Master Metals, Inc. (Respondent) to submit information relating to the hazardous waste handled at its Alpena Facility pursuant to regulations applicable to Boilers or Industrial Furnaces (BIFs) (40 CFR Part 266).

This is a request by the United States Environmental Protection Agency (U.S. EPA) pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Section 6927 and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. Law 99-499, 100 Stat. 1613 (1986) (SARA). The issuance of this request serves to require Master Metals, Inc. and Douglas Mickey (Respondents) to submit information relating to the generation, storage, treatment, and disposal of hazardous wastes and hazardous substances at its facility located on Cleveland, Ohio and is for the purpose of enforcing the provisions of RCRA and CERCLA. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et. seq.

I. INSTRUCTIONS

This request for information pertains to any and all information you may have regarding Master Metals, Inc.'s and Dougals Mickey's past and current management of hazardous waste and hazardous substances at the

Master Metals, Inc. Facility ("the Facility") located at 2850 W. Third Street, Cleveland, Ohio.

In part, this information request pertains to information relating to the operation of BIFs, as defined in 40 CFR §260.10, at the Facility. You must respond to the information request on the basis of all information and documents in your possession, custody or control, or in the possession, custody or control of your former or current employees, agents, servants, contractors, or attorneys. Furnish such information as is available to you, regardless of whether or not it is based on personal knowledge and regardless of source.

In answering this Information Request, identify all contributing sources of information, including the identification of the person(s) answering the request on your behalf. A separate response must be made to each request set forth in this Information Request.

The information must be provided notwithstanding its possible characterization as confidential information or trade secrets. You are entitled to assert a claim of confidentiality pursuant to Section 3007(b) of RCRA, 42 U.S.C. §6927(b) and 40 CFR §2.203(b) for any information produced that, if disclosed to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in 40 CFR Part 2. A request for confidential treatment must be made when information is provided, since any information not so identified will not be accorded this protection by the Agency. Any such confidentiality request must specifically indicate which items, documents, and/or information are claimed as

confidential, and must provide a detailed explanation supporting specifically each indicated item, document, and/or information.

Your response should be accompanied by an authorized affidavit from a responsible company official or representative stating that a diligent record search has been completed and there has been a diligent interviewing process with present and former employees who may have knowledge of the operations relating to hazardous and nonhazardous materials burned or processed in a BIF between January 1, 1993, and December 31, 1993. To the extent that any information you provide relating to the requests is based on the personal knowledge of your employees, agents, or other representatives, this information shall be in the form of a notarized affidavit. Should the signatory find, at any time after submittal of the requested information, that any portion of this submittal certified as true is false or misleading, the signatory should so notify U.S. EPA. If any information submitted under this information request is found by U.S. EPA to be untrue or misleading, such is subject to prosecution under Section 1001 of Title 18 of the U.S.C. or Section 3008(d) of RCRA, 42 U.S.C. §6928. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

If any information called for herein is not available or accessible in the full detail requested, this document shall be deemed to call for the best information available. The request also requires the production of all information called for in as detailed a manner as possible based upon such information as is available or accessible, including, where specific information is not available, an estimate and a detailed explanation of the method by which each estimate or response is made.

The written statements submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained therein are true and accurate to the best of the

signatory's knowledge and belief. Should the signatory find at any time after submittal of the requested information that any portion of this submittal certified as true is false or misleading, the signatory will promptly notify Stuart Hersh, Office of Regional Counsel, U.S. EPA, at (312) 886-6235. If any information submitted under this information request is found to be untrue or misleading, the signatory can be prosecuted under Section 1001 of Title 18 of the United States Code. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

The information requested herein must be provided to this office within 10 days of receipt of this request. Your response should be sent to the United States Environmental Protection Agency, 77 West Jackson, Chicago, Illinois 60604, Attention: Sheri L. Bianchin, HRE-8J.

II. DEFINITIONS

For the purpose of the Instructions and Requests for Information set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" shall mean the addressee of the Information Request, the addressee's company, the addressee's officers, managers, employees, contractors, trustees, any and all predecessors, any and all successors, assigns, subsidiaries, and agents.
2. "Automatic waste feed cut-off (AWFC) parameters" are those operational parameters which cause the automatic cut off of the hazardous waste feedstream when the applicable operating conditions set forth in 40 CFR §266.103 (c)(1)(i) and (v through xiii) (1991 edition) deviate from those established in the certification of compliance.

3. "AWFC occurrence" means the actual cut off of hazardous waste feedstream(s) due to the deviation of AWFC parameters from those established in the certification of compliance.
4. "BIF" means a boiler or an industrial furnace burning hazardous waste whose owner or operator is subject to 40 CFR Part 266.
5. "BIF metals" mean antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, silver, and thallium (see 40 CFR §266.106).
6. "Boiler" means an enclosed device using controlled flame combustion, as defined under 40 CFR §260.10.
7. "Burn" means burning for energy recovery or destruction, or processing for materials recovery or as an ingredient (see 40 CFR §266.100(a)).
8. "Certification of compliance" means the document submitted by the Respondent based on the compliance test, which establishes limits on the operating parameters specified 40 CFR §266.103(c)(1).
9. "Certification of precompliance" means the document submitted by the Respondent based on the best engineering judgment, which among other things establishes limits on the operating parameters specified 40 CFR §266.103(b)(3).
10. The term "Certified" means information as recorded in the certification of compliance or certification of precompliance.
11. As used here, "document" and "documents" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by the way of illustration and not by way of limitation), any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements, and the like, diary, calendar, desk

pad, scrap book, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intra-office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc, or disc pack; and any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, tape or other type of memory and together with printouts of such punch card, disc or disc pack, video tape or other type of memory); including (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any documents and (e) every document referred to in any other document.

12. "The Site" or "The Facility" shall mean and include the entire property on which the Master Metals, Inc. site located at 2850 W. Third Street, Cleveland, Ohio 44113, referenced as the Site.
13. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
14. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, including mixtures of hazardous substances with other substances including petroleum products.
15. "Facility" means the facility defined on the first page of this Information Request and all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating,

storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them), as defined in 40 CFR §260.10.

16. "Feed rate" means the rate at which BIF metals, total chlorine, and ash are established and monitored by Respondent's knowledge of (1) the concentration of the substance in each feedstream and (2) the flow rate of the respective feedstream.
17. "Flow Rate" means the rate of each feedstream obtained from Respondent's monitoring device which continuously measures the volume or mass of the respective feedstream injected into a BIF per time.
18. "Feedstream" means anything burned in a BIF, including any liquid, semi-liquid/solid, or solid hazardous or nonhazardous waste, fuels (e.g., coal, oil natural gas, etc.), industrial furnace feedstocks, and any other material.
19. "Hazardous waste feedstream" means any pumpable and/or nonpumpable feedstream which is or contains hazardous waste.
20. The term "pollutant" or "contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA.
21. The term "hazardous waste" shall mean a hazardous waste as defined by 40 CFR §§261.3 and 260.10.
22. The terms "furnish", "describe", or "indicate" shall mean turning over to U.S. EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to an information request, you must fully respond to the request with a written response. If such

requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.

23. The term "identify" means, with respect to a natural person, to set forth his full name, present or last known business address, the name of that employer and a description of the job responsibilities of such person.
24. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.) organization, if any, and a brief description of its business.
25. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance of the subject matter.
26. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substances or pollutants or contaminants.
27. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Information Requests any information which might otherwise be construed to be outside their scope.
28. As used here, "state the location" shall mean provide the most current address and telephone number of the person or thing to whom or which reference is made.
29. "Industrial furnace" means any of the enclosed devices that are integral components of manufacturing processes and that use thermal

treatment to accomplish recovery of materials or energy, as defined in 40 CFR §260.10.

30. "Substance" means BIF metals, total chloride/chlorine, and ash, as specified in 40 CFR §266.103 (b) (5) (iii).
31. "Total feedstream" means the combination of the hazardous waste feedstreams and all other feedstreams burned in a BIF.
32. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

III. REQUEST FOR ANSWERS AND THE PRODUCTION OF DOCUMENTS RELATING TO FINANCIAL INFORMATION.

1. Identify all persons consulted in the preparation of the answers to this Information Request.
2. Identify all documents consulted, examined, or referred to in the preparation of the answers to this Information Request and provide copies of all such documents.
3. Fully describe the current corporate and operational status of Master Metals, Inc. Furnish copies of all related documents.
4. Furnish copies of Master Metals, Inc. and your (i.e., Douglas Mickey) financial statements for years 1990, 1991, and 1992.
5. Furnish copies of all income tax returns and filings you (i.e., Douglas Mickey) have submitted to the United States Government for the years 1990, 1991, and 1992.

6. Furnish copies of all income tax returns and filings Master Metals, Inc. has submitted to the United States Government for the years 1990, 1991, and 1992.
7. Identify, describe and state the value of any and all things of value regardless of form or location (including, but not limited to, all assets, stocks, securities, bonds, real estate, personal property, intellectual property, bank accounts, certificates of deposit, other investments or investment instruments, trusts, regardless of in whose name legal title is held, powers of appointment, and any other powers, rights, interests and things of any value) in excess of ten thousand United States dollars (\$10,000) in which you (i.e., Douglas Mickey) have any right or any interest (ownership or otherwise), direct or indirect, or which is held by any person for the benefit of you. Where relevant, to calculate present values of future distributions use an interest rate of 3 percent compounded on an annual basis. Identify, describe and state the location of all things of value identified.
8. Identify, describe and state the value of any and all things of value regardless of form or location (including, but not limited to, all assets, stocks, securities, bonds, real estate, personal property, intellectual property, bank accounts, certificates of deposit, other investments or investment instruments, trusts, regardless of in whose name legal title is held, powers of appointment, and any other powers, rights, interests and things of any value) in excess of ten thousand United States dollars (\$10,000) in which Master Metals, Inc. has any right or any interest (ownership or otherwise), direct or indirect, or which is held by any person for the benefit of Master Metals, Inc. Where relevant, to calculate present values of future distributions use an interest rate of 3 percent compounded on an annual basis. Identify, describe and state the location of all things of value identified.

IV. REQUEST FOR ANSWERS AND THE PRODUCTION OF DOCUMENTS RELATING TO THE BIFs.

1. Identify and produce all information regarding the current disposal practices of the slag produced at Master Metals. Please state whether these practices have changes over time. Provide supporting documentation.
 2. For the past two (2) years, identify and produce all information regarding the amount and type of waste materials generated, stored, treated, and disposed at the Facility. Provide documentation of any waste analyses performed on these wastes and of these wastes any manifests or other documents which accompanied shipments of these wastes.
 3. Identify and produce all information and documents regarding whether Respondent has ever notified either the United States Environmental Protection Agency (U.S. EPA) or the Ohio Environmental Protection Agency (OEPA) of its hazardous waste activity. Specifically state whether the U.S. EPA or OEPA was notified of Respondent's generation, transportation, treatment, storage or disposal of waste materials including paint wastes, degreasing solvents, or waste oil at the Garage and Wally Road Lot locations.
 4. Identify and produce any permits or licenses for the Garage or Wally Road Lot locations for management (including generation, storage, treatment, transportation and disposal) of solid or hazardous waste.
1. State the type of facility operated by Master Metals.
 2. Provide information regarding the types of furnaces located at Master Metals. State whether Master Metals has operated its furnaces since August of 1991. If so, how many days has Master Metals operated its furnaces. If so, state the hours of operation, and through put for each furnace, what is the furnaces used for? Describe any and all purposes. Describe all materials fed into the furnaces.

3. What are Master Metals hours of operation? Typically, how many furnaces are operated in that time period?
4. Were the furnace(s) in existence on or before August 21, 1991? If so, state the date each furnace began operations.
5. Has Master Metals applied for any permits for the furnaces.
6. Provide any permit applications for operation any BIFs operated at Master Metals.
7. When was the last time Master Metals updated its part A application of the RCRA permit in accordance with 40 CFR 270.13 and 270.30? Please provide copies of all of the Part A permit applications submitted to either U.S. EPA or OEPA.
8. Does Master Metals submit a certification of precompliance for the furnace(s) in accordance with 40 CFR 266.103? If so, provide a copy.
9. Describe the "typical" feed materials placed into the furnace. Describe the composition of the "typical" product produced by Master Metals.
10. Provide any permit applications for operation of the furnace.
1.162.
11. Does Master Metals consider its furnace to be regulated by the Boiler/Industrial Furnace Regulations found at 40 CFR 266.
12. For each stream of material fed into furnace, state the source of the material and range of chemical constituents.
13. For each stream of feed materials, provide range of hazardous constituents.
14. What is the amount of material (i.e. volume) produced by a typical batch at Master Metals.

15. What is the typical amount of material (i.e. volume) of material placed into the furnaces for a batch at Master Metals.
16. Does Master Metals operate a batch type operation? If so, what is the length of time for a typical batch?
17. Does Master Metals keep records for all materials for reclamation which are brought onto the Facility? Does Master Metals keep records of all materials generated on-site which are disposed off-site or reclaimed in the furnace. If so, provide format of record keeping for each type of information, including bulk materials.
18. Provide records for materials for reclamation stored on-site as of December 31, 1992. Provide records for materials for reclamation stored on-site as of July 1, 1993.
19. For all slag produced by Master Metals since 1988, provide documentation of all chemical constituents, provide any chemical analyses to support this request for information.
20. How long does Master Metals keep its hazardous waste activity records?
21. Does Master Metals keep records of feed streams charged into the furnace?
22. What is the "desired" concentration of feed materials charged into the furnace?
23. What is the desired concentration of "product" produced by Master Metals?
24. Does Master Metals feed any materials into the furnace which are generated on-site. If so, what. Provide any documentation.
25. Does Master Metals typically sample charge materials going into the furnace. If so, state frequency of sample analysis.

26. Who is responsible for deciding the types of feed material to be charged into the furnace?
 27. What is the range of concentration of hazardous constituents charged into the furnaces at Master Metals?
 28. Does Master Metals feed hazardous waste in its furnace(s) for a purpose other than solely for an ingredient?
 29. Has Master Metals burned or processed in an industrial furnace irrespective of the purpose of burning or processing?
 30. Does Master Metals process hazardous waste solely for metal recovery?
 31. Did Master Metals provide a one-time notification to U.S. EPA or OEPA pursuant to 40 CFR 266.100?
 32. Did or does Master Metals claim the exemption of 40 CFR 266.100?
 33. Does Master Metals burn metal solely for metal recovery?
 34. Does all hazardous waste put into the furnace(s) at the facility contain recoverable levels of metals?
 35. Does Master Metals sample and analyze hazardous waste and other feedstocks under the procedures specified by Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846?
 36. Does any hazardous waste or any feedstocks put into the furnace(s) have hazardous waste with a total concentration of organic compounds listed in part 261, Appendix VIII, exceeding 500 ppm by weight.
 37. Does the hazardous water or any feed stock have a heating value of 5,000 BTU/lb or more, as-generated, or as-fired into the furnace?
- V. REQUEST FOR ANSWERS AND THE PRODUCTION OF DOCUMENTS RELATING TO THE BIFs AND REQUEST FOR COMPLIANCE INFORMATION WITH FEED RATE LIMITS.

1. Provide the maximum concentration of each substance in each feedstream burned by you in a BIF (except for BIFs which are cement kilns and light-weight aggregate kilns) for each day of the month. In order to determine the daily maximum concentrations for each substance, Respondent shall use the most current analytical and/or other type of data. If more than one set of information and/or data was collected, then Respondent shall report the higher maximum concentration for each substance for each feedstream for each day of the month. If a substance was not detected above the detection limit, then Respondent shall so indicate and provide the detection limit for the analytical method used. The unit of measurement shall be milligram per kilogram (mg/kg) or microgram per kilogram (ug/kg) for solid material and milligram per liter (mg/l) or microgram per liter (ug/l) for liquid material. Respondent shall indicate the date of analysis and/or evaluation of the feedstream, and other information used to determine maximum concentration.
2. Provide the maximum flow rate of each feedstream burned in each BIF for each day of the month. The daily maximum flow rate of each feedstream shall be the highest flow rate of each feedstream for the day, based on an instantaneous or hourly rolling average basis. If the flow rate of each feedstream is not determined from a direct monitoring device, Respondent shall indicate the method used to determine the flow rate of each feedstream. The unit of measurement shall be gram per hour (g/hr) for the flow rate of each feedstream. If a chemical property (e.g., density) is used to convert the unit, Respondent shall specify such chemical property and source of such information.
3. (1) Provide the maximum feed rate for each BIF metal burned in each BIF for each day of the month with respect to the: (A) total feedstream, (except that industrial furnaces which recycle particulate matter into the furnace pursuant to paragraph 40 CFR §266.103 (c) (3) (ii) (1991

edition) must specify limits on the concentration of each metal in collected particulate matter in lieu of feed rate limits); (B) total hazardous waste feedstream (unless complying with the Tier I or adjusted Tier I metals feed rate screening limits under 40 CFR §266.106 (b) or (e)); and (C) total pumpable hazardous waste feedstream.

(2) Provide the maximum feed rate of chlorine and chloride in the total feedstream for each day of the month. (3) Provide the maximum feed rate of ash in the total feedstream burned by you in a BIF for each day of the month. (4) Provide the minimum flue gas flow rate for each BIF operated by you for each day of the month converted to dry cubic feet per minute at 68 degrees (Fahrenheit) and 7 percent oxygen in the unit of dry standard cubic feet per minute. If the flue gas flow rate is not monitored, then provide the flue gas flow rate recorded in the certification of compliance or certification of precompliance. In providing information pursuant to this paragraph, the daily maximum feed rate of each BIF metal, chlorine, chloride and ash shall be determined by multiplying the daily maximum concentration of the substance, determined from Paragraph III.A., above, by the daily maximum flow rate of each same feedstream, determined from Paragraph III.B., above. The unit of measurement shall be g/hr for the daily maximum feed rate of each substance.

4. For each maximum feed rate of each substance calculated in Paragraph III.C., above, provide the feed rate as set forth in the certification of compliance or certification of precompliance submitted as more fully described below.

(A) Provide the feed rate limit of each BIF metal in the following feedstreams: (i) total feedstream (except that industrial furnaces which recycle particulate matter pursuant to paragraph (c) (3) (ii) of 40 CFR §266.103 (1991 edition) must specify limits on the concentration of each metal in collected particulate matter in lieu of feed rate limits); (ii) total hazardous waste feedstream

(unless complying with the Tier I or adjusted Tier I metals feed rate screening limits under 40 CFR §266.106 (b) or (e)); and (C) total pumpable hazardous waste feedstream.

(iii) Provide the feed rate limit of chlorine and chloride in the total feedstream.

(iv) Provide the feed rate of ash in the total feedstream, except that the ash feed rate for cement kilns and light-weight aggregate kilns is not required. If Respondent has submitted a certification of precompliance and notified U.S. EPA of an automatic extension, or obtained a case-by-case extension of time under 40 CFR §266.103(c) (7) (ii), the feed rate limit for a substance shall be the certified limit on its certification of precompliance. If Respondent has submitted a certification of compliance based on a compliance test, the feed rate limit for a substance shall be the certified limit on its certification of compliance. As defined in 40 CFR §266.103(c) (4) (iv), the feed rate limit for a substance shall be established based on the compliance test data as an average of all test runs of the highest hourly rolling average value for each run. (Note: Respondent shall not extrapolate the emission data generated from the compliance test to full load conditions in order to establish the feed rate limit unless approved by U.S. EPA.) The unit of measurement shall be g/hr for the feed rate limit of each substance.

5. If the daily maximum feed rate of any substance, as determined in Paragraph III.C., above, is higher than the feed rate limit for such substance as determined by Paragraph III.D., above, then the Respondent shall provide detailed information regarding the feedstream burned in the relevant BIF unit for that day. The information shall include, but not be limited to, all chemical analyses and/or other information for each feedstream, the monitored and/or determined flow rate, and the

feed fate of each substance in each feedstream which was burned in the BIF unit for the day such deviation occurred.

V. Request for Compliance Information with Operating Limits - Automatic Waste Feed Cut-off (AWFC)

1. For each AWFC parameter, provide the highest hourly measurement for each such parameter which is either recorded or calculated based on an instantaneous or hourly rolling average basis for each day of the month. Carbon monoxide concentration, and where required, hydrocarbon concentration in stack gas shall be obtained from the continuous emission monitoring device, on an hourly rolling average basis (i.e., over any 60 minute period), continuously corrected to 7 percent oxygen, dry gas basis.
2. Provide the AWFC operating limits certified in Respondent's certification of compliance. As defined in 40 CFR §266.103(c)(4)(iv), the operating limits shall be established based on compliance test data as the average over all test runs of the highest hourly rolling average value for each run. (Note: Respondent shall not extrapolate the operating data generated from the compliance test to full load condition to establish the operating limits unless approved by U.S. EPA.)
3. If the highest hourly measurement for any AWFC parameter, determined by Paragraph IV.A., above, exceeds the operating limits, as reported in Paragraph IV.B., above, the Respondent shall provide detailed information, including but not limited to, the exact time and duration of such deviation, and the corresponding waste feed rate for actual AWFC activity. If more than one deviation occurred at that hour, the Respondent shall provide information pertaining to all such deviations.
4. Provide a copy of all documents (e.g., operating record, operation log, etc.) which contains any description of the time and/or duration of any

AWFC Occurrence, the cause of such AWFC Occurrence and the post-AWFC Occurrence activities.

5. If any automatic wastefeed cutoff (AWFC) occurred for reasons other than a deviation from AWFC limits, including, but not limited to, calibration, inspection, repair, mechanical malfunction, and human error, the Respondent shall submit detailed information concerning such activities.
6. If the AWFC was not activated despite a deviation from operating parameters, the Respondent shall submit, in a separate response, the operating parameter which was deviated from, and the time and duration of such deviation(s). Respondent shall also describe any activities conducted by facility to repair such failure of the AWFC to be activated, and shall demonstrate that such failure was or will be repaired.

V. Request for Compliance Information with Minimum Temperature Requirement and other Requirements.

1. For each AWFC occurrence, provide the minimum combustion chamber temperature (or the indicator of combustion chamber temperature) monitored and/or recorded during the AWFC period, as defined under 40 CFR §266.103 (g). Provide the minimum chamber temperature (or the indicator of combustion chamber temperature) that occurred during the compliance test which must be maintained while hazardous waste or hazardous waste residues remain in the combustion chamber, with the minimum temperature during the compliance test defined under 40 CFR §266.103 (g) (1) (i and ii). If Respondent is complying with the Tier I or adjusted Tier I metals feed rate screening limit under 40 CFR §266.106 (b) or (e), Respondent shall also provide this information.
2. If Respondent feeds hazardous waste for a purpose other than as an ingredient at any location other than the hot end as specified in 40 CFR §266.103 (a) (5), Respondent shall provide for each day of the month

the minimum hourly combustion gas temperature at the location where the hazardous waste was injected. With respect to such minimum hourly combustion gas temperature, provide; (1) the location of such combustion gas temperature measurement as it relates to the point of hazardous waste injection, (2) the hourly minimum oxygen level in combustion gas, (3) the location of such oxygen level measurement as it relates to the point of hazardous waste injection, and (4) the type of combustion device and location of such hazardous waste injection. The minimum hourly combustion temperature and oxygen level denoted in this paragraph shall be the lowest combustion temperature or oxygen level collected from monitored data either on a instantaneous or hourly rolling average basis for each day. If the minimum hourly combustion temperature determined by this paragraph is less than 1800 degrees (Fahrenheit), then the Respondent shall provide all of the monitored and recorded combustion chamber temperature data, at least once every 15 seconds of the hour. The Respondent shall also demonstrate that the hourly minimum oxygen level present in the combustion gas, as set forth in this paragraph, is adequate to combust organic constituents in the waste as required under 40 CFR §266.103 (a) (5).

VI. Other Requests

1. If Respondent operates more than one BIF unit under interim status, the Respondent shall provide all of the information requested above separately for each BIF unit.
2. Provide the following certification: "I certify under the penalty of law that I have personally examined and am familiar with the Information Request and request for documents. Based on my review of all relevant documents and inquiry of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

3. Provide the following notarized certification by Douglas Mickey:

Issued this _____ day of _____, 1993.

Joseph M. Boyle, Chief
RCRA Enforcement Branch
U.S. Environmental Protection Agency

This is a request by the United States Environmental Protection Agency (U.S. EPA) pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Section 6927 and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. Law 99-499, 100 Stat. 1613 (1986) (SARA). The issuance of this request serves to require Granville Solvents, Inc. and John Reeb (Respondents) to submit information relating to the generation, storage, treatment, and disposal of hazardous wastes and hazardous substances at its facility located at ? Cleveland, Ohio and is for the purpose of enforcing the provisions of RCRA and CERCLA. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et. seq.

VII. REQUEST FOR ANSWERS AND THE PRODUCTION OF DOCUMENTS

Provide the following notarized certification by Dougals Mickey:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiry of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Issued this _____ day of _____, 1993

William E. Muno, Director
Waste Management Division